

Defendant's Exhibit 75

From: [David Ko](#)
To: [Blume, Robert C.](#); [*** Service-FB-CA MDL](#)
Cc: [Derek Loeser](#); [Cari Laufenberg](#); [Lesley Weaver](#); [Anne Davis](#); [Matt Melamed](#)
Subject: 4/27 30b6
Date: Wednesday, April 27, 2022 4:23:00 PM
Attachments: [30b6 Docs - Topics 1 and 3.docx](#)

[WARNING: External Email]

Counsel,

Pursuant to the Amended Deposition Protocol, please find attached a document that contains the potential exhibits (referenced by bates number) to be used for this Friday's 30b6 deposition on Topics 1 and 3. We understand that the deposition protocol requires these documents to be provided to you 72 hours of the deposition, and apologize that this is being sent to you one day late. We inadvertently did not see this provision until yesterday afternoon. Relatedly, we renew our request in Schedule B of the notice for Facebook to provide documents reviewed by the witness in advance of the deposition. The notice requested Facebook to provide these documents five business days in advance of the deposition. Those documents would also be potentially included in the exhibit list we are attaching here.

Please also let us know if Facebook is going to object to the use of these documents at the deposition on the basis that Plaintiffs provided these documents one day late.

You also requested that this deposition occur in person. Given the short notice, we are not able to accommodate that request, but would be willing to do it in person if we can move the deposition to early next week.

We are happy to discuss as well. Thank you.

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